



Clean Harbors Los Angeles, LLC
5756 Alba Street
Los Angeles, CA 90058
323.277.2500
323.277.2523
www.cleanharbors.com

Delivery via Electronic Mail

November 1, 2016

James Polek
Environmental Protection Agency **ENF-3-1**
Region IX – Pacific Southwest Region
75 Hawthorne Street
San Francisco, California 94105-3901

RE: Response to Clean Water Act Pretreatment Inspection of Clean Harbors Los Angeles, LLC (Facility);
located at 5756 Alba Street, Los Angeles, CA 90058;
EPA ID CAD 050 806 850

Ms. Polek,

The purpose of this correspondence is to respond to the Agency's letter dated August 9, 2016, which was based on the findings from the Facility's September 14, 2015 Clean Water Act Pretreatment Inspection. The letter requests that the Facility submit a response to the Agency's Summary of Requirements and Recommendations.

Requirements

Permit Citation: *"The industrial user shall at all times properly operate and maintain all facilities and systems for treatment and control (and related appurtenances) which are installed or used by the industrial user to achieve compliance with the conditions of the permit."*

- 1) The facility is required to ensure that it properly operates and maintains its equipment to reduce the risk of contaminating storm water with oil and ultimately achieve compliance with the discharge limits included in the facility's permit.
- 2) The facility is required to ensure that it properly operates and maintains its equipment (including level sensors) used to achieve compliance. The facility shall ensure that accurate tank levels for Tank V-9 are recorded in the log book to appropriately document discharge events and associated activities.

Facility Response:

- 1) Facility inspections are performed visually on a daily basis and recorded electronically as required by the Facility's Hazardous Waste Permit. Facility personnel were retrained on the inspection and work



order system to ensure that deficiencies are discovered and that a work order is issued immediately to address the issue.

- 2) Faulty level gauges have been replaced and calibrated to ensure accurate level readings. Facility personnel were also retained on reading the level gauges and accurately recording the data including discharge events, into the Facility's operating log.

Recommendations

- 1) It is strongly recommended that the facility ensure that representative storm water samples are collected utilizing a written technique that is representative of the constituents (e.g., oils) that may contaminate the storm water collected at the facility and discharged to the POTW.
- 2) It is strongly recommended that the facility implement a written process for sampling and discharging storm water from tank V-9 in a manner that does not jeopardize compliance with the discharge limitations included in the facility's permit.
- 3) It is recommended that the facility implement and adequately adhere to its spill prevention and clean up procedures to ensure that oils containing PCB's (i.e. hazardous waste liquids) are not leaking onto the pavement at the facility.
- 4) It is recommended that the facility ensure that it has the proper SOP's in place to identify, document and respond to work orders and ultimately ensure that process equipment is adequately operated and maintained.
- 5) It is recommended that the City follow-up with the facility and request and receive documentation showing when the level meters for the tank were replaced to confirm the varying levels of storm water stored in Tank V-9 according to the log book.

Facility Response

- 1) The Facility understands that the Agency has concerns that true representative samples were not being taken from the water discharge tank due to oil where the sample was being collected. The Facility has since purchased a sampling device which is lowered into the tank from the top. The device is able to collect a sample from all phases (i.e. top, middle, and lower) of the water stored inside of the tank. This device provides a more accurate sample for lab personnel to analyze to ensure that the Facility's water is conforming to the permitted discharge parameters.
- 2) The facility has revised its current sampling protocol to include the newly purchased sampling device to ensure that true representative samples are being taken from the water discharge tank. Revisions have been made to ensure that accurate recording of discharge events is addressed.



- 3) Facility personnel were retrained on spill response protocol. Identifying leaks and spills during the daily inspection process and immediately cleaning up the leak or spill was also addressed.
- 4) Section 5 of the Facility's Hazardous Waste Permit Application addresses facility inspections and documentation. The section also discusses the facility work order process to ensure that deficient items are repaired. Facility personnel were retrained on this section to ensure that everyone has a thorough understanding of the entire process.
- 5) After discussing with facility personnel, it was discovered that the level gauge on Tank V-4 was replaced and not the gauge on Tank V-9. The discrepancy with the data entry in the log book was an operator error and not a mechanical error as the previous GM suggested. Facility personnel were made aware of the error and everyone has been retrained on the accuracy of data entry and rechecking tank levels to make sure that the level gauge matches the entry. Tank V-9 was inspected by a state certified P.E. to ensure that the tank is functioning properly. Tank V-9 passed the inspection.

If you have any questions regarding the information submitted in this correspondence, feel free to contact Joe Christopher, Facility Compliance Manager at 310-835-9998, ext: 499. Thank you for your time.

Sincerely,

A handwritten signature in black ink that reads "Steve Peterson". The signature is written in a cursive, flowing style.

Steve Peterson
General Manager
Clean Harbors Los Angeles, LLC

Enclosure Tank V-9 External Inspection

cc: Theodore Higgins City of Los Angeles Bureau of Sanitation
 Cris Morris Los Angeles Regional Water Quality Board

Clean Harbors Los Angeles Facility

External Inspection

Tank Number: Tank V-9
Inspection Date: 1/26/2016
Scope of Work: External Inspection of Tank V-9

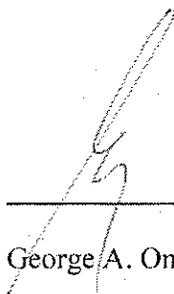
Inspection Notes:

An exterior inspection of Tank V-9 was performed on 1/26/2016. This inspection included a full visual inspection of the tank exterior and ultrasonic thickness measurements on the shell and roof.

The visual inspection found the tank to be in acceptable overall condition. Local coating failure of the roof was noted.

The ultrasonic thickness measurements were generally consistent with the previous measurements collected in 2014. Several locations on the shell and roof were found to have corroded approximately 0.010" since the previous inspection.

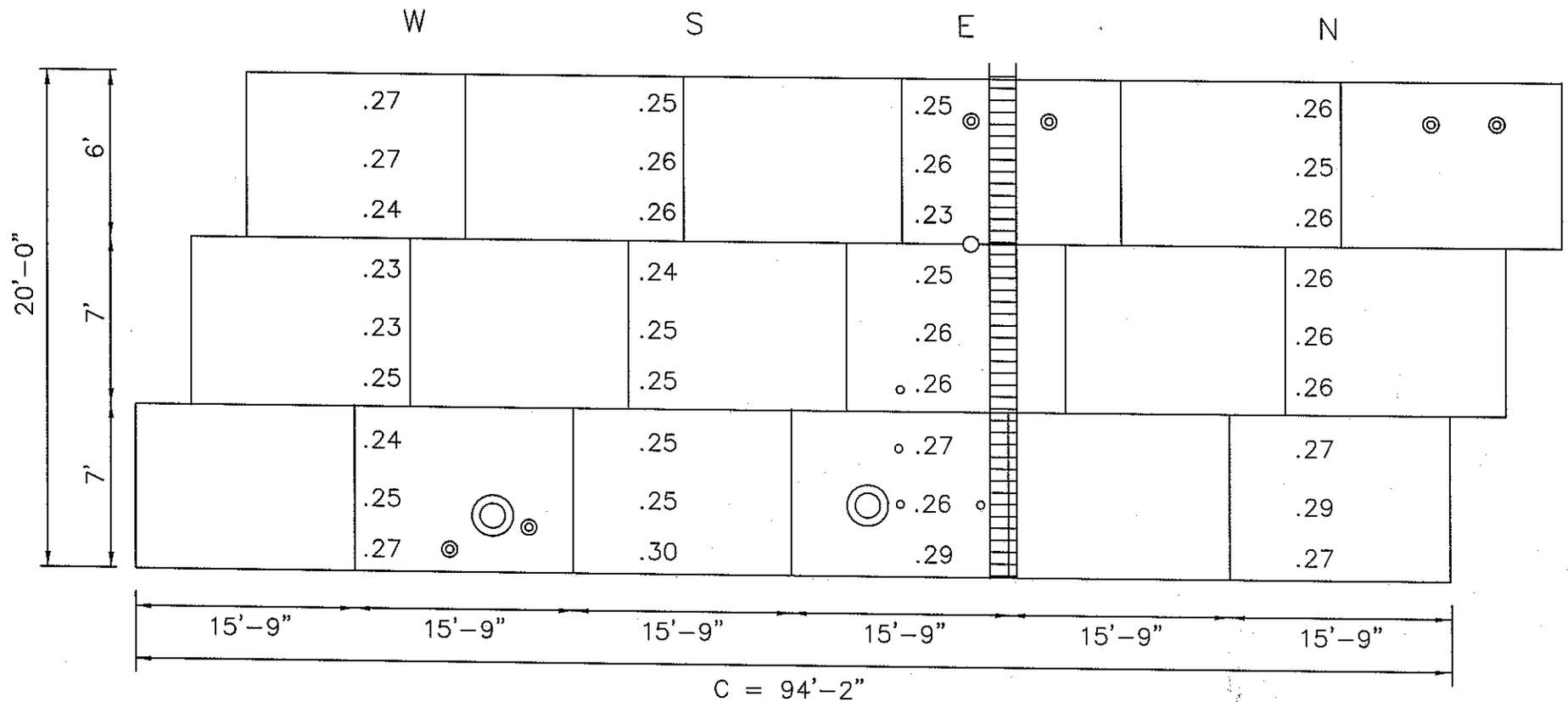
Inspector:


George A. Oney, P.E.



Registered Professional Engineer, State of California
Registration No. CH004494

API-653 Aboveground Storage Tank Inspector
Certification No. 54053



Omega Technical Services Inc.
 2736 Via Sinaloa
 Claremont, CA, 91711
 Tel: (909) 223-5888
 Fax: (909) 625-3009

REVISIONS		
NO.	DATE	BY
1	01/07/2011	GM
2	12/10/2014	GM
3	02/10/2016	GM
4		
5		
6		

Clean Harbors Environmental Services
 5756 Alba St.
 Los Angeles, CA. 90058

TANK FABRICATED BY	
SHELL THICKNESS =	BOTTOM THICKNESS =
TOP THICKNESS =	
DIAMETER = 30'	HEIGHT = 20'

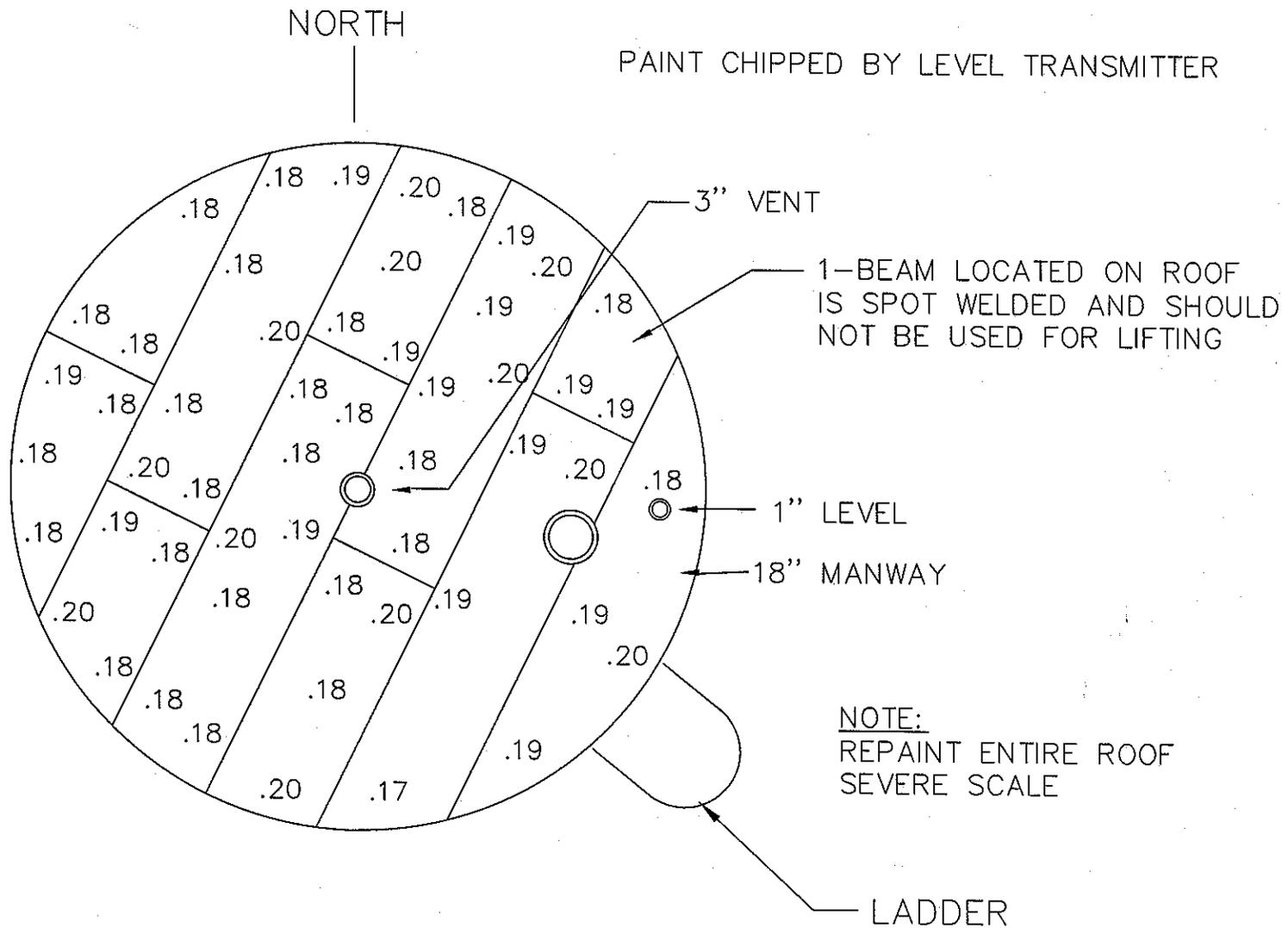
DRAWN BY
 G.MANDLEY

DATE
 01/07/2011

SCALE
 NTC

DRAWING NO.

V-9 Shell

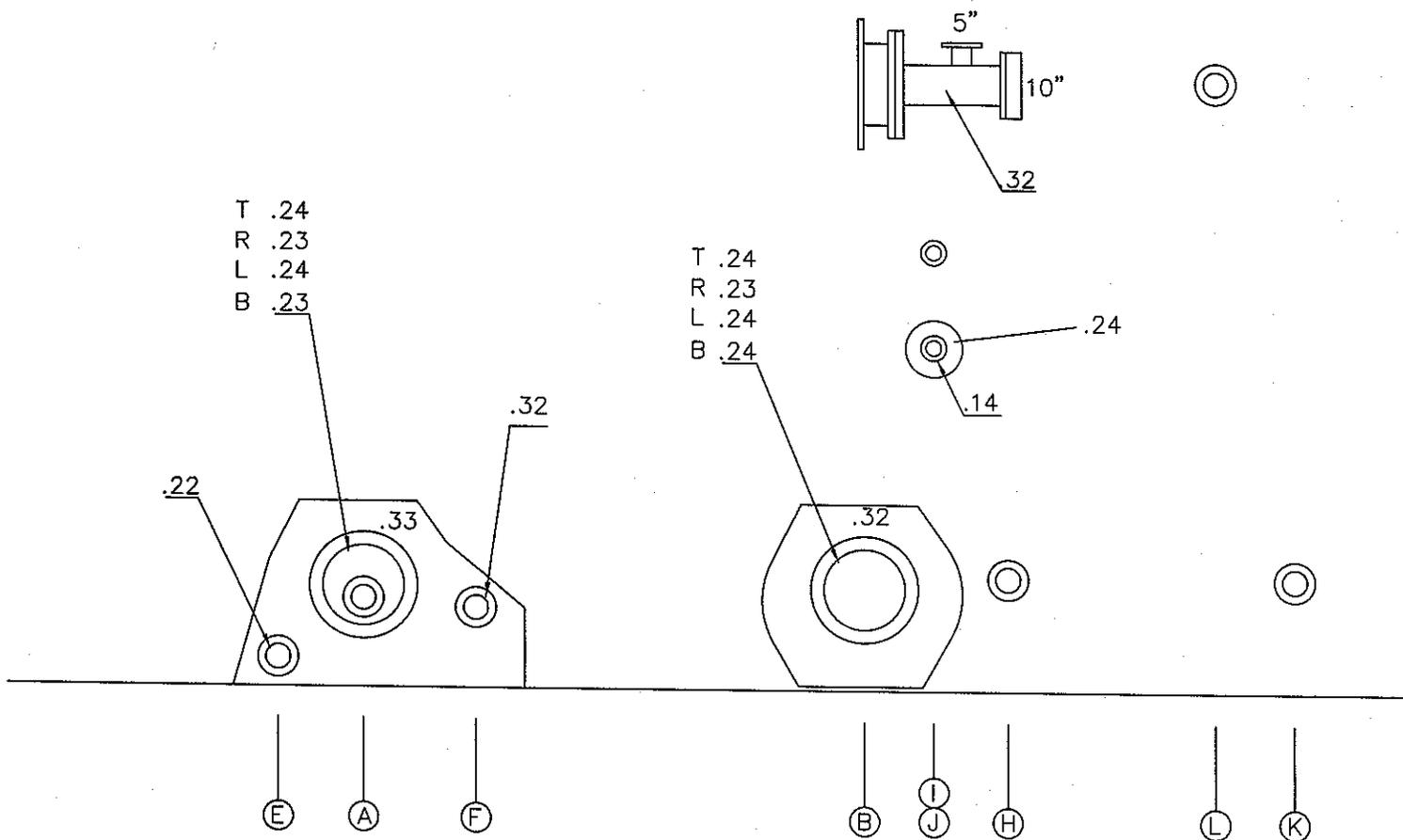


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REVISIONS			Clean Harbors Environmental Services 5756 Alba St. Los Angeles, CA. 90058	
NO.	DATE	BY	TANK FABRICATED BY	
1	01/07/2011	GM	SHELL THICKNESS =	BOTTOM THICKNESS =
2	02/10/2016	GM	TOP THICKNESS =	DIAMETER =
3				HEIGHT =
4			DRAWN BY	DATE
5			G.MANDLEY	01/07/2011
6			SCALE NTC	DRAWING NO. V-9 Roof

NOZZLE	SIZE	RATING	USE
A	20"		MANWAY
B	20"		MANWAY
C	6"	125#	
D	6"	125#	
E	4"	150#	
F	4"	150#	
G	3"	150#	
H	4"	150#	
I	2"		
J	2"		
K	6"		
L	6"		



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6		

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TANK FABRICATED BY		
SHELL THICKNESS =	BOTTOM THICKNESS =	
TOP THICKNESS =	DIAMETER =	
HEIGHT =		
DRAWN BY	DATE	DRAWING NO.
G.MANDLEY	01/07/2011	V-9 Nozzles
SCALE	NTC	